

MJF:JAJ  
F# 2009R00312

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N F O R M A T I O N

-against-

Cr. No. 09-089 (CBA)  
(T. 18, U.S.C., §§  
1962(c), 1962(d), 1963,  
2 and 3551 et seq.)

ALVARO LOPEZ,  
also known as "Lazy,"

Defendant.

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THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

At all times relevant to this Information, unless  
otherwise indicated:

The Enterprise

1. La Mara Salvatrucha, also known as the "MS-13,"  
(hereinafter the "MS-13" or the "enterprise") was a gang  
comprised primarily of immigrants from Central America, with  
members located throughout Queens, New York, Long Island, New  
York and elsewhere. Members and associates of the MS-13 have  
engaged in narcotics trafficking and acts of violence, including  
murder, attempted murder, robbery and assault.

2. The defendant ALVARO LOPEZ, also known as "Lazy,"  
was a member of the MS-13.

3. The MS-13, including its leadership, membership  
and associates, constituted an "enterprise" as defined by Title

18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise was engaged in, and its activities affected, interstate and foreign commerce.

Purposes of the Enterprise

4. The purposes of the enterprise included the following:

a. Promoting and enhancing the prestige, reputation and position of the enterprise with respect to rival criminal organizations.

b. Preserving and protecting the power, territory and criminal ventures of the enterprise through the use of intimidation, threats of violence and acts of violence, including assault and murder.

c. Keeping victims and rivals in fear of the enterprise and its members and associates.

d. Enriching the members and associates of the enterprise through criminal activity, including robbery and narcotics trafficking.

Means and Methods of the Enterprise

5. Among the means and methods by which the defendant and his associates conducted and participated in the conduct of the affairs of the enterprise were the following:

a. Members of the MS-13 and their associates committed, attempted to commit and threatened to commit acts of violence, including murder, attempted murder, robbery and assault, to enhance the enterprise's prestige and protect and expand the enterprise's criminal operations.

b. Members of the MS-13 and their associates used and threatened to use physical violence against various individuals, including members of rival criminal organizations.

c. Members of the enterprise and their associates used, attempted to use and conspired to use robbery and narcotics trafficking as means of obtaining money.

COUNT ONE  
(Racketeering)

6. The allegations contained in paragraphs one through five are realleged and incorporated as if fully set forth in this paragraph.

7. On or about and between January 1, 2006 and September 27, 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALVARO LOPEZ, also known as "Lazy," together with others, being a person employed by and associated with the MS-13,

an enterprise that engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conducted and participated, directly and indirectly, in the conduct of the affairs of the MS-13 through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and (5), consisting of the racketeering acts set forth below.

RACKETEERING ACT ONE  
(Murder)

8. On or about May 18, 2007, within the Eastern District of New York, the defendant ALVARO LOPEZ, together with others, did knowingly and intentionally cause the death of another person, to wit: Maurice Parker, in violation of New York Penal Law Sections 125.25(1) and 20.00.

RACKETEERING ACT TWO  
(Conspiracy to Murder)

9. On or about July 27, 2007, within the Eastern District of New York and elsewhere, the defendant ALVARO LOPEZ, together with others, did knowingly and intentionally conspire to cause the death of one or more other persons, to wit, members of a set of the Latin Kings gang, located in Huntington, New York, in violation of New York Penal Law Sections 125.25(1) and 105.15.

(Title 18, United States Code, Sections 1962(c), 1963, 2 and 3551 et seq.)

COUNT TWO  
(Racketeering Conspiracy)

10. The allegations contained in paragraphs one through five are realleged and incorporated as if fully set forth in this paragraph.

11. On or about and between January 1, 2006 and September 27, 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALVARO LOPEZ, also known as "Lazy," together with others, being a person employed by and associated with the MS-13, an enterprise that engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally conspire to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and (5).


12. The pattern of racketeering activity through which the defendant ALVARO LOPEZ agreed to conduct the affairs of the enterprise consisted of the racketeering acts set forth in paragraphs eight and nine of Count One of this Information, as Racketeering Acts One and Two, which are realleged and incorporated as if fully set forth in this paragraph. The defendant agreed that a conspirator would commit at least two

acts of racketeering in the conduct of the affairs of the enterprise.

(Title 18, United States Code, Sections 1962(d), 1963 and 3551 et seq.)

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BENTON J. CAMPBELL  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. § 0.136